UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

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-vs- Case # 95-80071

HON. BERNARD FRIEDMAN

DANI HOURANI,

Defendant.

MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE

Now comes Dani Hourani, by and through his attorney Steven Fishman, and in support of his Motion for Early Termination of Supervised Release states as follows:

- Mr. Hourani was placed on supervised release by this Court on
 September 21, 2020. His supervised release is scheduled to end on September 21,
 2023.
- 2. Since being released from custody, Mr. Hourani has been employed at Team Wellness Center in Dearborn as the director of community reintegration. He has kept the Court fully informed of the nature of his employment, including arranging for a virtual tour of the facility in the fall. Other judges in the Eastern District, including Judge Berg and Judge Tarnow, have already taken the virtual tour.
 - 3. The nature of Mr. Hourani's work requires him to be in contact with

convicted felons who have completed their sentences and are in the process of being reintegrated into society.

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4. On information and belief, such contact with convicted felons may

conflict with the rules of the Probation Department regarding supervised release.

5. In addition to his work, Mr. Hourani has also done volunteer work with

ACCESS, a charitable organization in the area. On information and belief, the

Court has been provided with photos of Mr. Hourani working with ACCESS.

6. Since Mr. Hourani has been a model citizen since his release, and since

his work with recently released felons in reintegrating them into society clearly

benefits the community, the interests of justice would be served by terminating his

supervised release at this time to avoid any conflict with the rules of the Probation

Department regarding supervised release.

7. Based on a telephone conversation, Mr. Hourani's supervised release

officer, David Smith, enthusiastically supports this motion.

WHEREFORE, Defendant Hourani requests that this Court grant his

Motion for Early Termination of Supervised Release.

Respectfully submitted,

s/ Steven Fishman

Steven Fishman (P23049) Attorney for Defendant Hourani

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Dated: June 11, 2021

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BRIEF IN SUPPORT OF MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE

The relief requested in this motion lies within the sound discretion of the Court.

Respectfully submitted,

s/ Steven Fishman Steven Fishman (P23049) Attorney for Defendant Hourani 615 Griswold, Suite #1120 Detroit, MI 48226 (313) 920-2001 e-mail: sfish66@yahoo.com

Dated: June 11, 2021

CERTIFICATE OF SERVICE

This is to certify that on June 11, 2021, I served a copy of the attached motion upon the United States Attorney's Office, by filing same electronically.

s/ Steven Fishman Steven Fishman